

ORIGINAL

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9/7/00
FILED
HARRISBURG, PA

SEP 06 2000

MARY E. D'ANDREA, CLERK
Per 9/8

MICHAEL J. BUSHMAN,
Petitioner,

v.

JAKE MENDEZ, Warden,
Respondent.

Civil No. 1:CV-00-1230
(Kane, J.)
(Smyser, M.J.)

MOTION FOR EXTENSION OF TIME

NOW COMES, the Petitioner, Michael J. Bushman, and appearing pro se, hereby files this his MOTION FOR EXTENSION OF TIME, seeking an extension up to and including September 20, 2000 in which to file a Traverse to the Respondent's Response, and as grounds for granting same, the Petitioner respectfully presents:

1. The institution, last week, on Wednesday, August 30, 2000, was placed on a security lock-down. The Response to Show Cause Order was received during this lock-down.
2. Petitioner needs the additional time in order to conduct the appropriate legal research in order to adequately respond to Respondent. The hours of the law library are restrictive due to the regime of the routine here at USP Allenwood.
3. An extension of time would not prejudice either party, and the government responded after receiving an extension of time.

WHEREFORE, facts and premises considered, the Petitioner prays that this Court grant an extension of time up to, and including September 20, 2000 in which to file a traverse herein.

Dated: September 2, 2000

Respectfully submitted:




Michael J. Bushman
Reg. No. 22758-083
USP Allenwood
P.O. Box 3000
White Deer, PA. 17887-3000

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing was mailed to:

Kate L. Mershimer
Assistant U.S. Attorney
316 Federal Building
240 West Third Street
Williamsport, PA. 17703

placing same in a plain wrapper, properly addressed, with sufficient postage affixed thereto, and placing same in an official depository for delivery by the United States Postal Service on this 3rd day of September, 2000.


Michael J. Bushman